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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

THE ROMAN CATHOLIC ARCHBISHOP OF
SAN FRANCISCO,

Debtor.

Case No.: 23-30564

Chapter 11

**DECLARATION OF BRITTANY M.
MICHAEL IN SUPPORT OF
COMMITTEE'S RESPONSE TO
DECLARATION OF JOSEPH J.
PASSARELLO IN SUPPORT OF
CHAPTER 11 PETITION AND
DEBTOR'S EMERGENCY MOTIONS**

Pursuant to 28 U.S.C. sec. 1746, I, Brittany M. Michael, hereby submit this declaration
(the "Declaration") under penalty of perjury:

1. I am of counsel at the law firm of Pachulski Stang Ziehl & Jones LLP ("PSZJ") with
an office at One Sansome Street, Suite 3430, San Francisco, California 94104. I am duly admitted to
practice law in the United States District Courts for the Southern and Western Districts of New York
and the District of Minnesota. On November 16, 2023, this Court entered an order admitting me to
practice *pro hac vice* in the above-captioned case (the "Case"). See Docket No. 330.

2. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein. If called as a witness, I would testify as to those facts.

3. The Court has approved PSZJ's employment as counsel to the Official Committee of Unsecured Creditors (the "Committee") of The Roman Catholic Archbishop of San Francisco (the "RCASF" or "Debtor" or "Archdiocese") in the above-captioned case. Docket No. 188.

4. I submit this Declaration in support of the *Committee's Response to Declaration of Joseph J. Passarello in Support of Chapter 11 Petition and Debtor's Emergency Motions* to which this Declaration is appended.

5. Attached as Exhibit 1 is a true and correct copy of the Transcript of Continued 341 Meeting, dated Oct. 12, 2023.

6. Attached as Exhibit 2 is a true and correct copy of the Reply Brief of Petitioner the Roman Catholic Archbishop of San Francisco, a Corporation Sole, on the Second Cause of Action, No. CGC-10-498795 (Cal. Super. Ct. S.F. Jan. 18, 2011).

7. Attached as Exhibit 3 is a true and correct copy of the Central Administrative Office of the Roman Catholic Archdiocese of San Francisco Financial Statements from June 30, 2021 and 2020 (downloaded Apr. 10, 2024).

8. Attached as Exhibit 4 is a true and correct copy of the Archdiocese's Verified Complaint for Declaratory Relief; Verified Petition for Writs of Mandate; and Request for Stay Order, No. CGC-10-498795 (Cal. Super. Ct. S.F. Apr. 16, 2010).

9. Attached as Exhibit 5 is a true and correct copy of the Decision and Order Granting the Committee's Motion for Partial Summary Judgment Under Bankruptcy Rule 7056, No. 19-00001 (D. Guam July 16, 2021), Docket No. 164.

1 10. Attached as **Exhibit 6** is a true and correct copy of the Parish Finance Policy Training,
2 dated February 1, 2018, *available at* <https://www.sfparishconnect.com/finance/> (downloaded Mar. 19,
3 2024).

4 11. Attached as **Exhibit 7** is a true and correct copy of the Parish and School Financial
5 Policy Manual, *available at* [https://www.sfparishconnect.com/wp-content/uploads/2022/08/](https://www.sfparishconnect.com/wp-content/uploads/2022/08/Financial-Policy-Manual-and-Reporting-System-Revised-August-15-2022.pdf)
6 [Financial-Policy-Manual-and-Reporting-System-Revised-August-15-2022.pdf](https://www.sfparishconnect.com/wp-content/uploads/2022/08/Financial-Policy-Manual-and-Reporting-System-Revised-August-15-2022.pdf) (downloaded Mar. 19,
7 2024).

8 12. Attached as **Exhibit 8** is a true and correct copy of the V-1 Sample Parish Holiday and
9 Vacation Addendum to Personnel Handbook, *available at* [https://www.sfparishconnect.com/wp-](https://www.sfparishconnect.com/wp-content/uploads/2021/08/v_1-parish-holiday-and-vacation-addendum-template-3.pdf)
10 [content/uploads/2021/08/v_1-parish-holiday-and-vacation-addendum-template-3.pdf](https://www.sfparishconnect.com/wp-content/uploads/2021/08/v_1-parish-holiday-and-vacation-addendum-template-3.pdf) (downloaded
11 Mar. 19, 2024).

12 13. Attached as **Exhibit 9** is a true and correct copy of the Archdiocese of San Francisco
13 Policies and Procedures Regarding Harassment, *available at* [https://www.sfparishconnect.com/wp-](https://www.sfparishconnect.com/wp-content/uploads/2021/08/Harassment-Policy-2018-1.pdf)
14 [content/uploads/2021/08/Harassment-Policy-2018-1.pdf](https://www.sfparishconnect.com/wp-content/uploads/2021/08/Harassment-Policy-2018-1.pdf) (downloaded Mar. 19, 2024).

15 14. Attached as **Exhibit 10** is a true and correct copy of the Record Retention Guidelines:
16 Destruction and Retention of Documents, *available at*
17 <https://www.sfparishconnect.com/docs/records-retention-guidelines/> (downloaded Mar. 19, 2024).

18 15. Attached as **Exhibit 11** is a true and correct copy of the Policy Regarding Stipends,
19 *available at* <https://www.sfparishconnect.com/docs/policy-regarding-stipends-human-resources/>
20 (downloaded Mar. 19, 2024).

21 16. Attached as **Exhibit 12** is a true and correct copy of the Electronic and Internet
22 Fundraising Policy, *available at* [https://www.sfparishconnect.com/docs/electronic-and-internet-](https://www.sfparishconnect.com/docs/electronic-and-internet-fundraising/)
23 [fundraising/](https://www.sfparishconnect.com/docs/electronic-and-internet-fundraising/) (downloaded Mar. 19, 2024).

1 17. Attached as **Exhibit 13** is a true and correct copy of the Policy Regarding Use and
2 Monitoring of Internet, E-Mail, and Other Technology, *available at*
3 <https://www.sfparishconnect.com/docs/policy-regarding-use-and-monitoring-of-internet-e-mail-and->
4 [other-technology/](https://www.sfparishconnect.com/docs/policy-regarding-use-and-monitoring-of-internet-e-mail-and-) (downloaded Mar. 19, 2024).

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6 18. Attached as **Exhibit 14** is a true and correct copy of the Archdiocese of San Francisco
7 Building Construction, Renovation and Maintenance Policy, *available at*
8 <https://www.sfparishconnect.com/docs/archdiocese-of-san-francisco-building-construction->
9 [renovation-maintenance-policy/](https://www.sfparishconnect.com/docs/archdiocese-of-san-francisco-building-construction-) (downloaded Mar. 19, 2024).

10 19. Attached as **Exhibit 15** is a true and correct copy of the Policy and Guidelines for
11 Childcare/Preschool Programs in Parishes of the Archdiocese of San Francisco, *available at*
12 <https://www.sfparishconnect.com/docs/policy-and-guidelines-for-childcare-preschool-programs-in->
13 [parishes-of-the-archdiocese-of-san-francisco/](https://www.sfparishconnect.com/docs/policy-and-guidelines-for-childcare-preschool-programs-in-) (downloaded Mar. 19, 2024).

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15 20. Attached as **Exhibit 16** is a true and correct copy of the document production received
16 by the Committee on March 29, 2024 from the Archdiocese of San Francisco Cemeteries Department,
17 bates labeled CEMETERIES 00001 to CEMETERIES 00023.

18 21. Attached as **Exhibit 17** is a true and correct copy of the 2022 Report: Measuring Abuse
19 Prevention and Safe Environment Programs as Reported Online in Diocesan Policies and Practices,
20 *available at* <https://www.votf.org/wp-content/uploads/VOTFPOCReport20221.pdf> (downloaded Apr.
21 10, 2024).

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23 22. Attached as **Exhibit 18** is a true and correct copy of the Transcript of 341 Meeting,
24 dated Sept. 28, 2023.

25 23. Attached at **Exhibit 19** is a true and correct copy of the data available from the
26 California Department of Social Services website filtered by Licensee – Archbishop of San Francisco,
27
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1 available at <https://www.cclld.dss.ca.gov/carefacilitysearch/DownloadData> (downloaded Mar. 19,
2 2024).

3 24. Attached at **Exhibit 20** is a true and correct copy of a letter from the Archdiocese
4 regarding the tax exempt status of St. Hilary School, available at
5 https://townoftiburon.granicus.com/MetaViewer.php?view_id=5&clip_id=533&meta_id=23936
6 (downloaded Apr. 19, 2024).
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8 25. Attached as **Exhibit 21** is a true and correct copy of the TNCRRG policy provided to
9 the Committee from counsel to TNCRRG.

10 Pursuant to 28 U.S.C. sec. 1746, I declare under penalty of perjury that the foregoing is true
11 and correct to the best of knowledge and belief. I executed this Declaration on April 19, 2024 at
12 Minneapolis, Minnesota.
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14 By: /s/ Brittany M Michael
15 Brittany M. Michael
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